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July 25, 2007

VIA ELECTRONIC FILING

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

**Re: Notice of Oral Ex Parte Communication, In the Matter of Petition of
TeleCommunication Systems, Inc. and HBF Group, Inc. for Waiver of Part 52
of the Commission's Rules, WCB Docket 99-200**

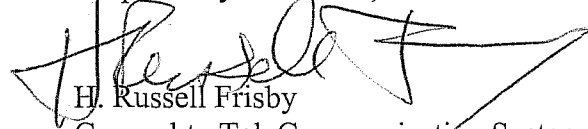
Dear Ms. Dortch:

On July 25, 2007, the undersigned as counsel, together with Timothy Lorello, Senior Vice President of TeleCommunication Systems, Inc. ("TCS"), met with Marcus Maher, Associate Bureau Chief, and Nicholas Alexander, Legal Advisor, Wireline Competition Bureau. Rudy Baca of Fleischman and Walsh also attended.

Petitioner discussed why the Federal Communications Commission's grant of the above-referenced petition is necessary to ensure the continued efficient provision and deployment of VoIP E911 service. The Petitioner also discussed why other approaches will result in a process that is both time consuming and inefficient.

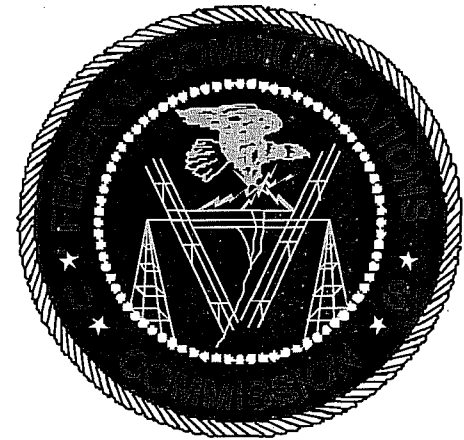
Pursuant to the Commission's rules, 47 C.F.R. § 1.1206(b) (1), this letter, along with the material distributed at the meeting, is being filed electronically for inclusion in the record of the above-referenced proceeding.

Respectfully submitted,



H. Russell Frisby
Counsel to TeleCommunication Systems, Inc.

Attachment
cc: Marcus Maher
Nicholas Alexander
195471



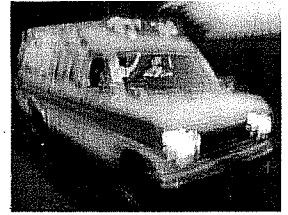
p-ANI Assignment Challenges: Petition for Waiver

Timothy Lorello
Sr. Vice President, Chief Marketing Officer

July 25th, 2007



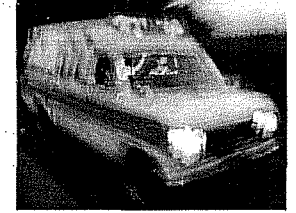
Petition For Waiver



- TCS filed a Petition for Waiver
 - Petitioners provide support for significant VoIP coverage
 - As VPC, Petitioners acquired ESQKs following NENA model
 - Efficient use of ESQK numbering resources
 - Reduced testing required by PSAPs
 - Increased reliability due to fewer provisioned systems
 - Faster nationwide deployment for VoIP subscribers
 - Navin Letter indicated that CLEC registration is required
 - In every state in which service is offered (i.e., all 50 states)
 - Without waiver, Petitioners could be restricted from getting ESQKs
 - Petitioners are not CLECs and do not have nationwide registrations
 - Petitioners requested a continuation of the current model
- FCC has instructed Neustar to continue providing ESQKs for the interim
- Intrado filed comments on the Petition for Waiver



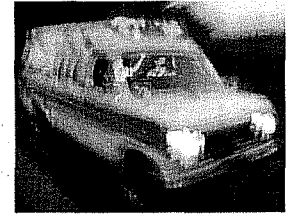
Intrado's Counterpoints



- Unprecedented velocity of VoIP deployments
 - Attributable to p-ANI access
- States have a vital interest in p-ANI resources and wish to regulate them
- Users of p-ANI need to have high integrity and subject to state level certifications
- Intrado is CLEC certified in 34 states & will obtain certifications where required
- Waiver is too broad
 - Waivers should be case-by-case where states are not granting CLEC status



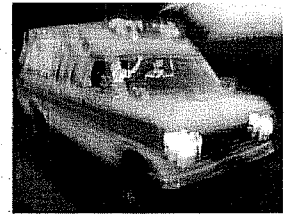
Discussion



- Unprecedented velocity of VoIP deployments
 - Attributable to p-ANI access
- Petitioners agree that unprecedented VoIP deployments have been due to all having access to the p-ANIs



Discussion



- States have a vital interest in p-ANI resources and wish to regulate them
- Petitioners point out that FCC has ruled that VoIP internet access is to be regulated at the Federal level



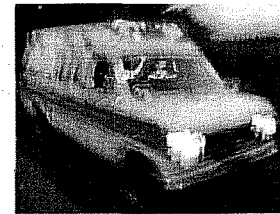
Discussion



- Users of p-ANI need to have high integrity and subject to state level certifications
- Petitioners have demonstrated the required level of integrity and have obtained CLEC registration in at least one state



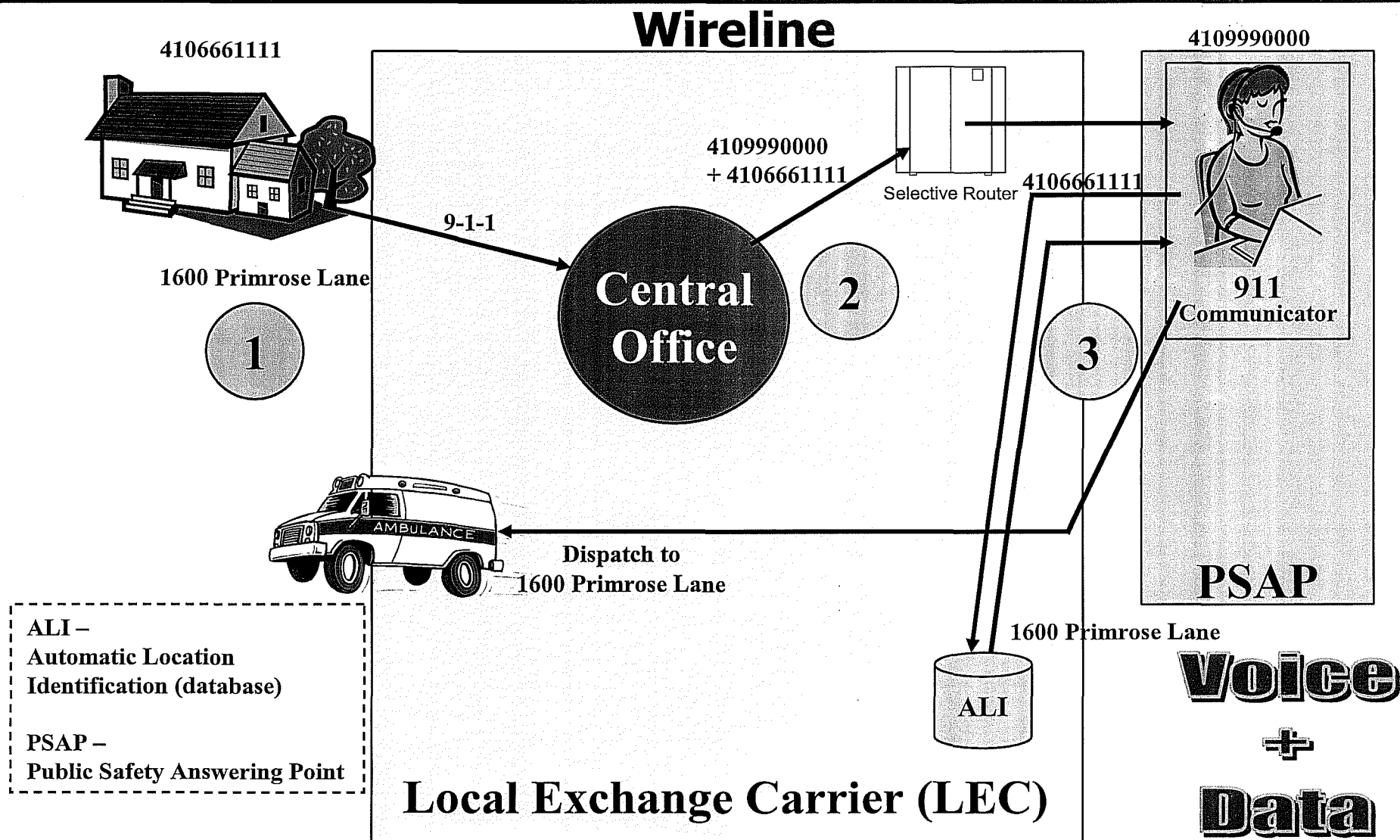
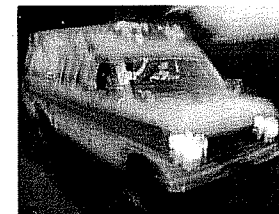
Discussion



- Intrado is CLEC certified in 34 states & will obtain certifications where required
- Petitioners believe this is an illustration of the different business models that VoIP has stimulated

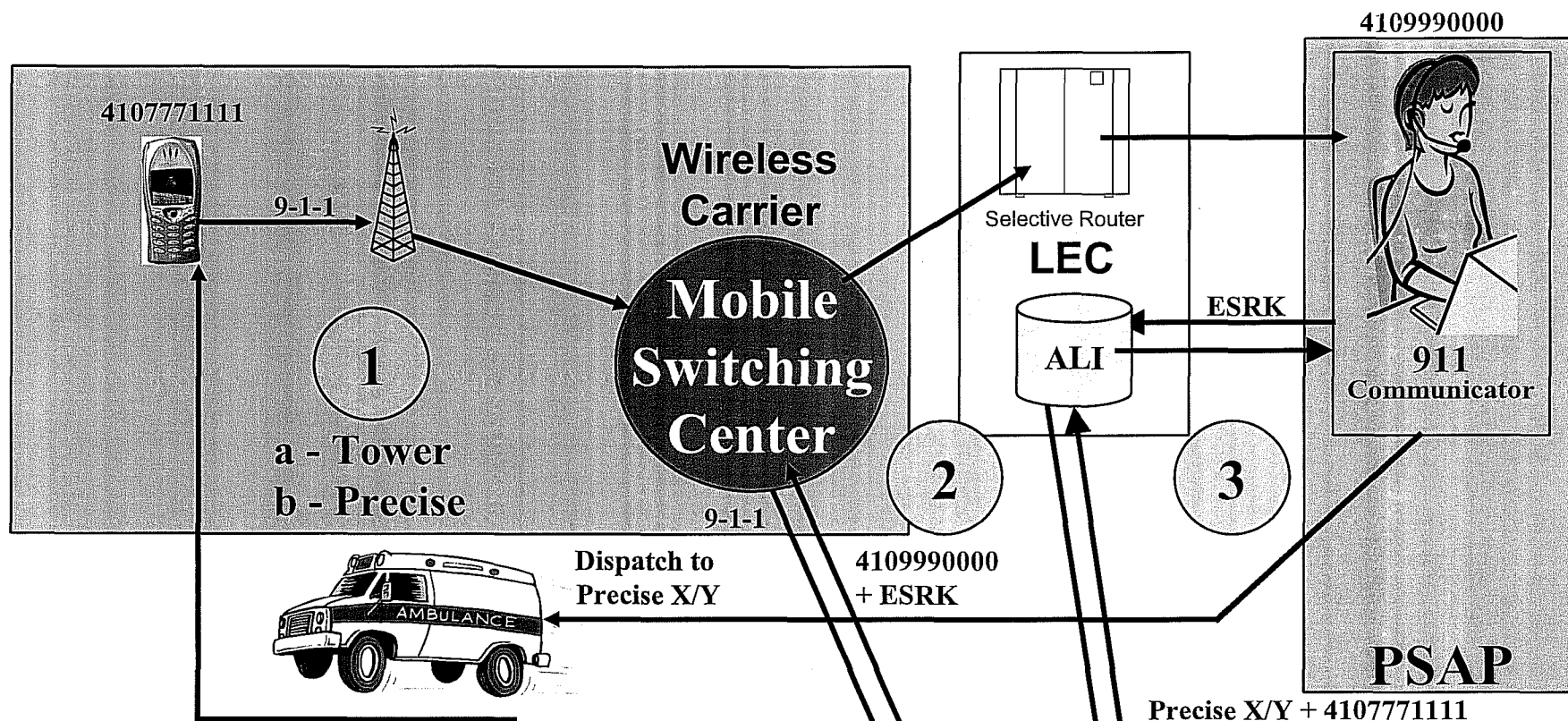
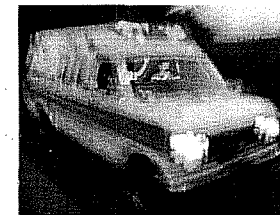


Wireline E9-1-1 Success



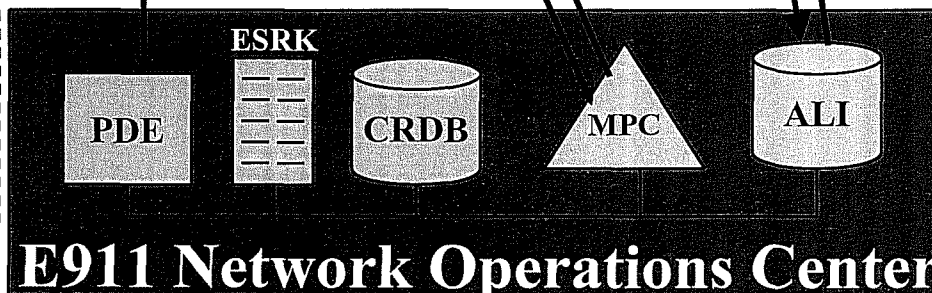


Wireless E9-1-1 Success



CRDB –
Call Routing Data Base

PDE –
Position Determination Entity

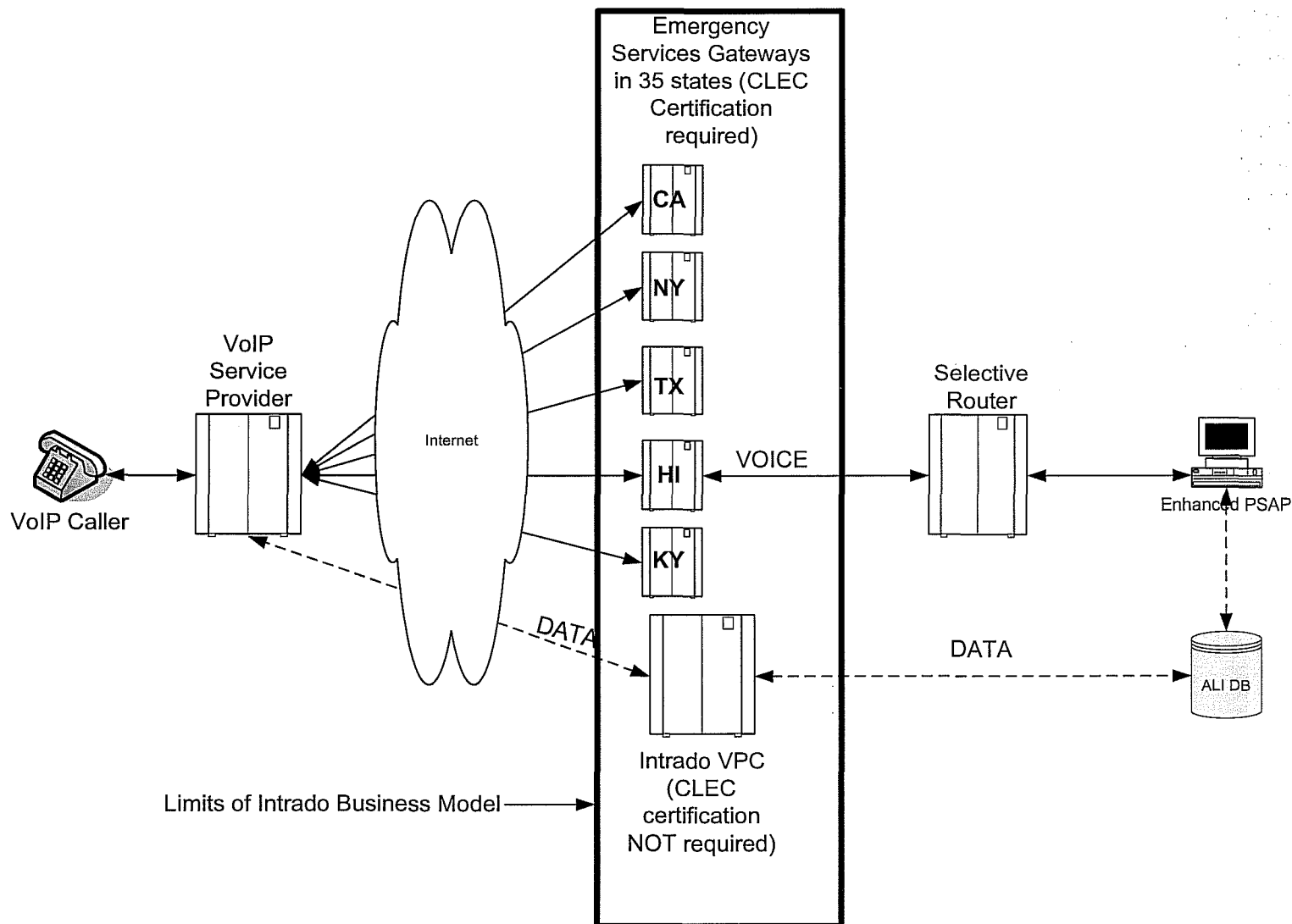
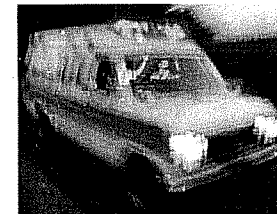


MPC –
Mobile Positioning Center
ESRK =
Emergency Services Routing
Key

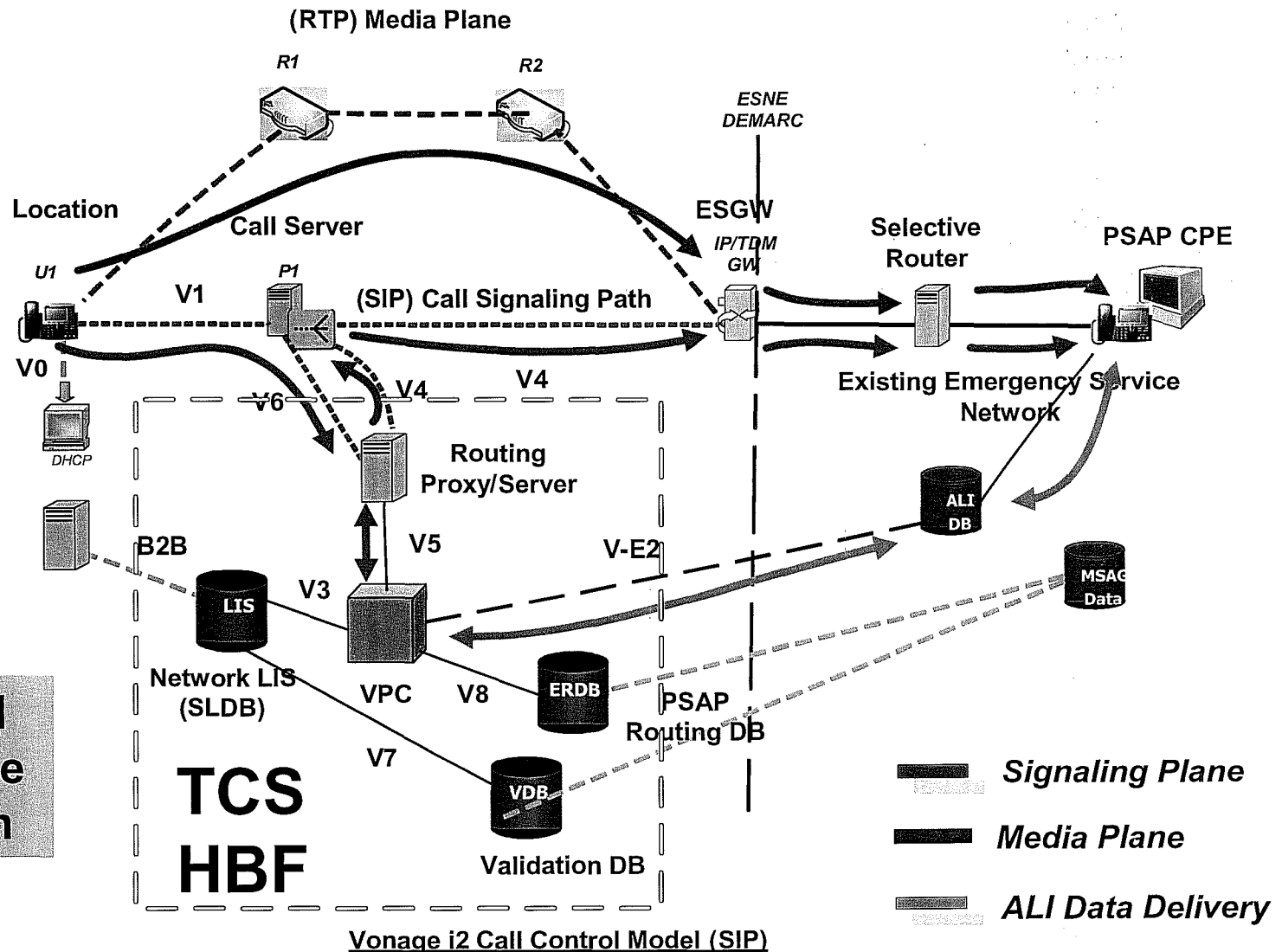
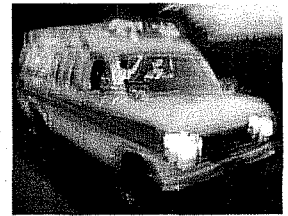
E911 Network Operations Center



Intrado Model



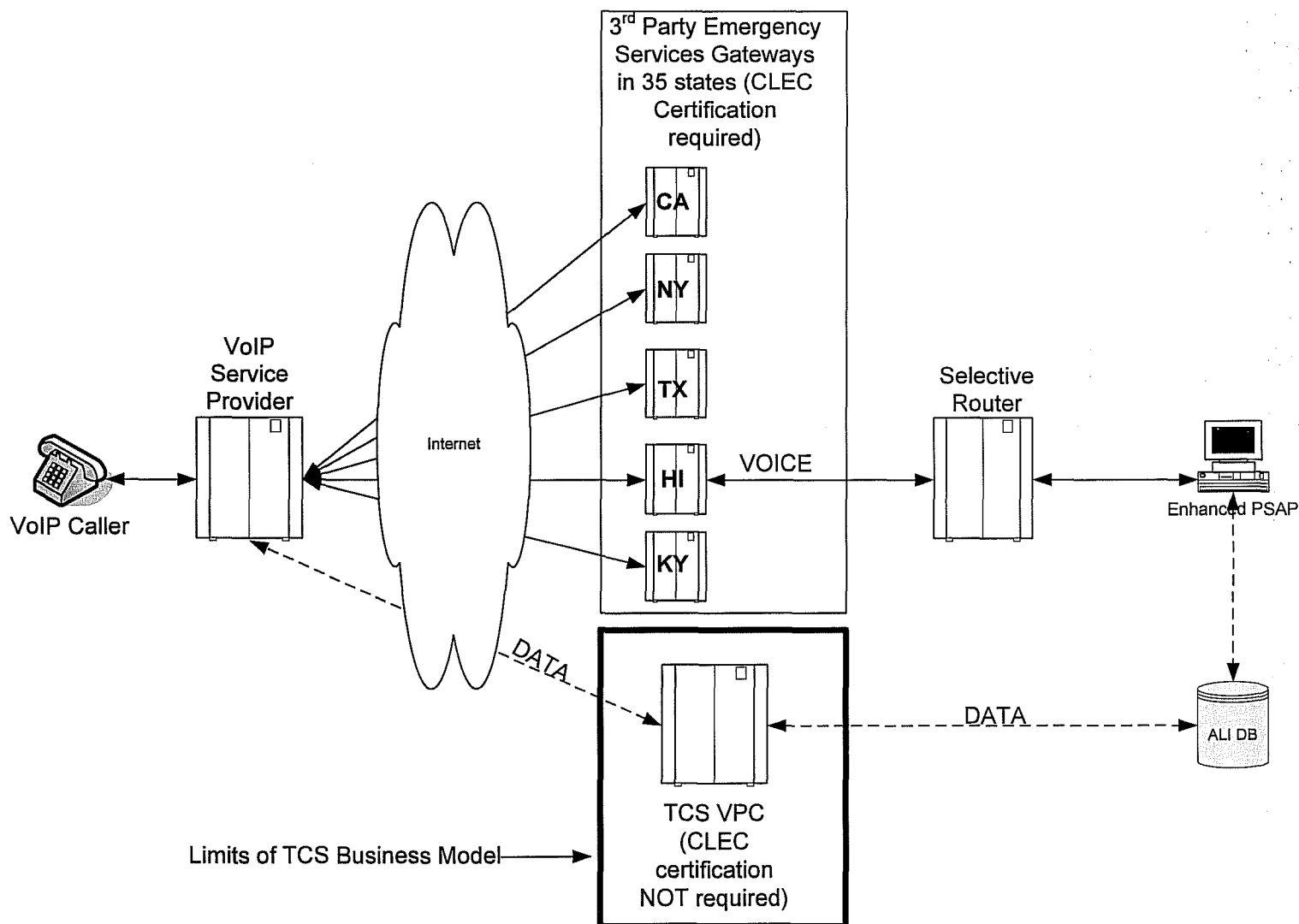
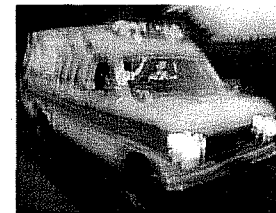
NENA i2 Model



VPC need
not provide
voice path

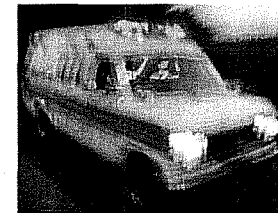


TCS/HBF Model

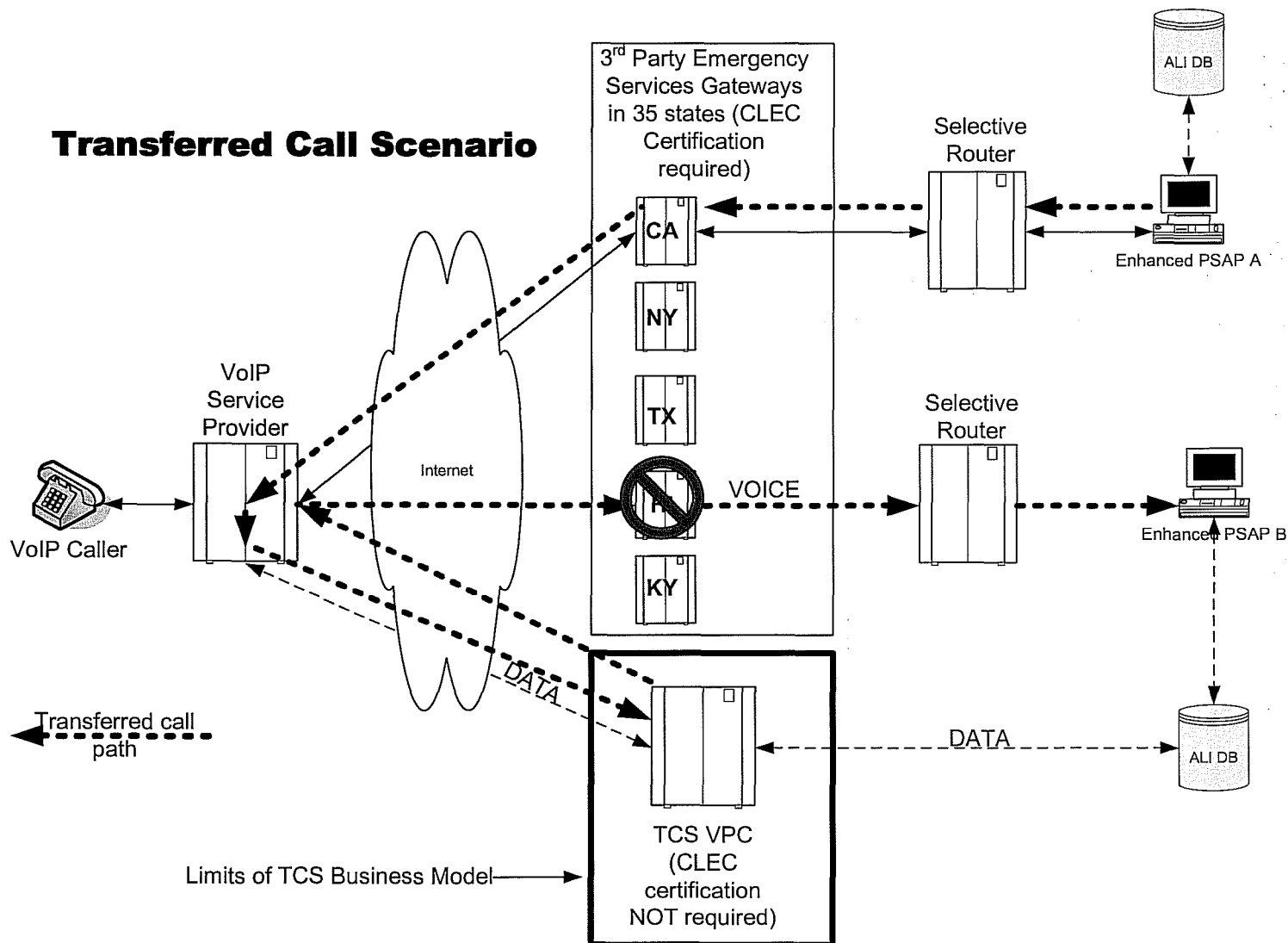




Impact on Call Transfers

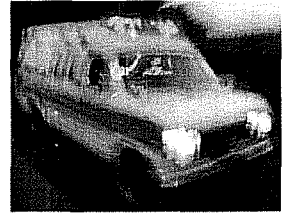


Transferred Call Scenario





Discussion

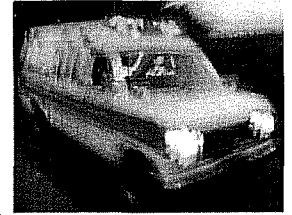


- Waiver is too broad
 - Waivers should be case-by-case where states are not granting CLEC status

- Petitioners believe that such an approach would be time consuming, inefficient, and inappropriate for a service regulated at the Federal level



Future Course



Petitioners believe:

- That the current approach to p-ANI assignment has assisted in the very rapid VoIP E9-1-1 deployments
 - That our current successes are a demonstration of commitment to integrity and prudent use of resources
 - That VoIP, as expected, is introducing new business models
 - That the requested waiver continues to have merit
-
- We respectfully request that the waiver be granted



Questions

Tim Lorello

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